UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA **\$\$\$\$\$\$\$\$**\$\$\$\$ v. **Criminal No. 4:24-CR-478** SHELDON DOUNN,

Defendant.

UNOPPOSED MOTION TO CONTINUE TRIAL

Defendant is currently scheduled for pretrial conference on April 28, 2025, and trial on May 5, 2025.

Discovery in this case is voluminous: to date the United States has produced digital copies of more than 350,000 records, and made many more available under the Government's discovery obligations.

Additional time is needed regarding discovery, conducting pre-trial discovery conferences, and exploring possible pre-trial resolutions. Therefore, the United States respectfully requests that the trial, pretrial, and motion dates be reset for a date no earlier than September 2025.

Respectfully submitted,

Nicholas J. Ganjei **United States Attorney**

/s/ Drew Pennebaker By: Andrew Pennebaker Trial Attorney United States Department of Justice Fraud Section, Criminal Division 1000 Louisiana Street, Suite 2300 Houston, Texas 77002 Andrew.Pennebaker@usdoj.gov (202) 597-0683

CERTIFICATE OF CONFERENCE AND SERVICE

I certify that I conferred with counsel for the Defendant who is unopposed to this motion.

I certify that on April 3, 2025, I served a copy of this Motion by email on counsel for Defendant.

/s/ Drew Pennebaker Andrew Pennebaker